

Enclosed please find a copy of AT&T's § 63.71 Application, which was filed with the FCC. This courtesy copy is provided in compliance with 47 C.F.R. § 63.71(a).

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Section 63.71 Application of	)	
	)	File No.
BellSouth Telecommunications, LLC	)	
	)	
For Authority Pursuant to Section 214 of	)	
The Communications Act of 1934, As Amended,	)	
To Discontinue the Provision of Service	)	

**SECTION 63.71 APPLICATION OF AT&T**

AT&T Services, Inc., on behalf of its affiliates, BellSouth Telecommunications, LLC, d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, and AT&T Tennessee (collectively, referred to herein as “AT&T”) applies for authority under Section 214(a) of the Communications Act, as amended (“the Act”), 47 U.S.C. § 214, and Section 63.71 of the Federal Communications Commission’s (“Commission”) rules, 47 C.F.R. § 63.71, to discontinue Self-Healing Multi-Nodal Alternate Route Topology Ring (SMARTRing) Service throughout its service area in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee.

As required by Section 63.71 of the Commission’s rules, AT&T provides the following information:

**Name and Address of Carrier:**

BellSouth Telecommunications, LLC

The address for purposes of this application is:  
208 S. Akard Street, Floor 16  
Dallas, TX 75202

**Date of Planned Service Discontinuance:**

Effective on or after December 1, 2021, pending regulatory approval, SMARTRing (“Affected Service”) will no longer be available to new customers. Also, effective on or after December 1, 2021, moves, adds, and change orders will no longer be permitted except that existing customers will be permitted to modify their existing service and add new circuits to their existing service subject to and coterminous with the customer’s existing term payment plan or term agreement, but existing customers will not be permitted to add new nodes in any location and upgrades and downgrades will not be permitted. Current customers subscribing to the Affected Service may continue to purchase service on a month-to-month basis or enter a 12-month term plan, when it is available. Effective on or after November 23, 2023, existing customers will no longer be able to renew a term payment plan or agreement and no move, add or change orders of any type will be accepted.

**Points of Geographic Areas of Service Affected:**

AT&T will grandfather the Affected Services through its service territory in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee.

**Brief Description of Type of Service Affected:**

The Affected Service is a dedicated high-capacity network via a self-healing ring topology between multiple customer designated locations and company central offices. This network consists of fiber routed through local, alternate central office, internodal, and/or interoffice channel

facilities that transmit DS-1, DS-3, STS-1, OC-3, OC-48, OC-192 and/or 1000 Mbps channel service simultaneously over primary and alternate paths between customer designated locations and AT&T central offices.

AT&T is discontinuing this service due to decreased demand as customers are instead using Ethernet services, and the technology required for SMARTRing is nearing the end of its life cycle. The public convenience and necessity will not be impaired by the grandfathering of these services as alternative services options are available to these customers, such as Ultravailable Network Service ("UVN"), AT&T Virtual Private Network ("AVPN") service, AT&T Dedicated Ethernet ("ADE") service, AT&T Dedicated Internet ("ADI") service, and AT&T Switched Ethernet Service ("ASE").

**Brief Description of the Dates and Methods of Notice to All Affected Customers:**

Customer notices were sent via U.S. Mail on October 6, 2021.<sup>1</sup> Copies of this Application are being sent, first class U.S. Mail to the public utility commission, governor, federally recognized tribes (if any) in the affected states, and to the Special Assistant for Telecommunications to the Secretary of Defense, as required by 63.71(a) of the Commission's rules.<sup>2</sup>

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<sup>1</sup> See Attachment A.

<sup>2</sup> Section 63.71(a) directs applicants to submit a copy of the application to the Secretary of Defense, Special Assistant for Telecommunications. However, due to restructuring within the Department of Defense, that position no longer exists. Commission staff has advised that a copy of the application be sent instead to the Department of Defense Chief Information Officer.

**Regulatory Classification of Carrier:**

AT&T offers the Affected Services pursuant to non-dominant carrier regulation.<sup>3</sup>

Questions about this application may be addressed to Josh Woodbridge, AT&T Services, Inc., Director - Federal Regulatory, 1120 20th Street N.W., Suite 1000, Washington, D.C. 20036, (202) 457-2139.

**Conclusion:**

As discussed above, the public convenience and necessity will not be adversely affected by the grandfathering of the Affected Service because AT&T offers other solutions. AT&T respectfully requests the Commission approve its Section 63.71 Application.

Respectfully submitted,

By: /s/ Cindy Manheim

Cindy J. Manheim  
David J. Chorzempa  
David L. Lawson  
AT&T Services, Inc.  
1120 20<sup>th</sup> Street NW  
Suite 1000  
Washington, D.C. 20036

*Its Attorneys*

October 15, 2021

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<sup>3</sup> See Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) from Title II and Computer Inquiry Rules with Respect to Its Broadband Services; Petition of BellSouth Corporation for Forbearance Under Section 47 U.S.C. §160(c) from Title II and Computer Inquiry Rules with Respect to Its Broadband Services, Memorandum Opinion and Order, 22 FCC Rcd 18705 (2007) at 18723-25, para. 30.

# ATTACHMENT A

October 6, 2021

[REDACTED]

**Notice Regarding Self-Healing Multi-Nodal Alternate Route  
Topology Ring (SMARTRING)  
(also known as BellSouth SPA Dedicated Ring)  
Change in Service Effective 12/1/2021**

Thank you for using AT&T for your business service needs. We want to make you aware of planned changes to your Self-Healing Multi-Nodal Alternate Route Topology Ring (SMARTRing) Service, also known as BellSouth SPA Dedicated Ring in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee, (collectively referred to as "Service").\*

**Effective December 1, 2021**, pending regulatory approval (where required), Service offered under the AT&T Interstate Access Guidebook and the applicable state tariffs or guidebooks will no longer be available to new customers (not current contract or service) in the states of AL, FL, GA, KY, LA, MS, NC, SC, and TN. As a current AT&T customer you may retain your existing service(s) subject to the following changes in service:

- **Effective December 1, 2021, Moves, Additions, and Change orders for SMARTRING will no longer be accepted with the following exceptions.**
  - Existing customers will be permitted to modify their existing Service and will be able to add new circuits to their existing Service, but will not be permitted to add new nodes in any locations. Any such new circuits will be subject to and coterminous with the customer's existing term payment plan or term agreement for the Service to which they are added.
  - Neither upgrades nor downgrades will be permitted.
  - Customers with expiring contracts may continue to purchase Service on a month-to-month basis or enter into a 12-month term plan, when available. AT&T will be introducing a new 12-month term plan on or about December 1, 2021.
- **Effective November 30, 2023, unless specified to the contrary in their existing service agreements: (a) existing customers may not renew Term Payment Plans or term agreements; and (b) no Move, Add, or Change orders of any type will be accepted.** Following the expiration of existing term payment plans or term agreements, AT&T will provide this Service on a month-to-month basis until the Service is discontinued. During any month-to-month service period, AT&T may change the rates, terms, and conditions of the Service upon required notification.

\* Service provided under the AT&T Interstate Access Guidebook and applicable state tariffs or guidebooks by BellSouth Telecommunications, LLC, d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, and AT&T Tennessee.

(Over)

AT&T offers Ultravailable Network Service (UVN), AT&T Virtual Private Network (AVPN) Service, AT&T Dedicated Ethernet (ADE) Service, AT&T Dedicated Internet (ADI) Service, and AT&T Switched Ethernet (ASE) Service as alternative services.

If you have any questions, please contact your account manager, the customer service center at 1-800-721-8127, or [www.att.com](http://www.att.com).

We appreciate your business and look forward to serving your future business needs.

Sincerely,

Scott E. Beckett  
 AT&T Product Marketing Director  
 208 S Akard St.  
 Floor 16  
 Dallas, TX 75202  
[g17576@att.com](mailto:g17576@att.com)

**BAN(S) associated with this notice:**

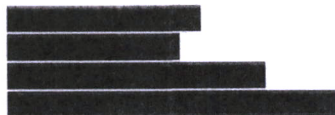
[REDACTED]

**The FCC requires AT&T to provide the following statement:**

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days for a non dominant service after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the section 63.71 Application of BellSouth Telecommunications, LLC, d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, and AT&T Tennessee. Comments should include specific information about the impact of this proposed discontinuation (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.



October 6, 2021



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\* Service provided under the AT&T Interstate Access Guidebook and applicable state tariffs or guidebooks by BellSouth Telecommunications, LLC, d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, and AT&T Tennessee.

(Over)

To the extent your contract with AT&T is inconsistent with the above, these planned changes may not apply to you. Please check your contract or contact us with questions.

AT&T offers Ultravailable Network Service (UVN), AT&T Virtual Private Network (AVPN) Service, AT&T Dedicated Ethernet (ADE) Service, AT&T Dedicated Internet (ADI) Service, and AT&T Switched Ethernet (ASE) Service as alternative services.

If you have any questions, please contact your account manager, the customer service center at 1-800-721-8127, or [www.att.com](http://www.att.com).

We appreciate your business and look forward to serving your future business needs.

Sincerely,

Scott E. Beckett  
AT&T Product Marketing Director  
208 S Akard St.  
Floor 16  
Dallas, TX 75202  
[g17576@att.com](mailto:g17576@att.com)

**BAN(S) associated with this notice:**

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**CERTIFICATE OF SERVICE**

I, **Lisa Granger**, certify that I have, on October 15, 2021 served a copy of the foregoing Section 63.71 Application of AT&T by U.S. Mail postage prepaid to the address on the attached sheets:

/s/ Lisa Granger  
Lisa Granger

Alabama Public Service  
Commission  
100 N. Union Street  
Suite 950 Montgomery,  
AL 36130

Office of the Governor State  
Capitol  
600 Dexter Avenue  
Montgomery, AL 36130

Florida Public Service  
Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Office of the Governor  
The Capitol  
400 S. Monroe St.  
Tallahassee, FL 32399-0001

Office of the Governor  
Georgia State Capitol  
206 Washington St.  
Suite 203  
Atlanta, GA 30334

Georgia Public Service  
Commission  
244 Washington Street, SW  
Atlanta, GA 30334

Louisiana Public Service  
Commission  
P.O. Box 91154  
Baton Rouge, LA 70821

Office of the Governor P.O.  
Box 9404  
Baton Rouge, LA 70804-9004

Office of the Governor 700  
Capital Avenue Suite 100  
Frankfort,  
KY 40601

Kentucky Public Service  
Commission  
211 Sower Boulevard  
Frankfort, KY 40601

Office of the Governor  
P.O. Box 139 Jackson, MS  
39205

Mississippi Public Utilities  
Commission  
Woolfolk Building 501 North  
West Street Jackson, MS  
39201

Office of the Governor 20301  
Mail Service Center Raleigh,  
NC 27699-0301

North Carolina Utilities  
Commission  
430 North Salisbury Street  
Dobbs Building Raleigh, NC  
27603-5918

Office of the Governor 11  
Gervais Street  
Columbia, SC 29201

Public Service Commission of  
South Carolina,  
101 Executive Center Dr.,  
Suite 100  
Columbia, SC 29210

Governor's Office Tennessee  
State Capitol Nashville, TN  
37243-0001

Tennessee Regulatory  
Authority  
502 Deaderick Street  
Nashville, TN 37243

Department of Defense Chief  
Information Officer 6000  
Defense Pentagon  
Washington, D.C.  
20301

Poarch Band of Creeks Chairman  
5811 Jack Springs Road, Atmore,  
AL, 36502

Seminole Tribe of Florida Chairman  
6300 Stirling Road,  
Hollywood, FL, 33024

Miccosukee Tribe of Indians  
Chairman Tamiami Station, P.O.  
Box 440021,  
Miami, FL, 33144

Chitimacha Tribe of Louisiana  
Chairman  
P.O. Box 661, Charenton, LA,  
70523

Coushatta Tribe of Louisiana  
Chairman  
P.O. Box 818, Elton, LA, 70532

Jena Band of Choctaw Indians  
Chairman  
P.O. Box 14, Jena, LA, 71342

Tunica-Biloxi Indian Tribe  
Chairman P.O. Box 1589,  
Marksville,  
LA, 71351

Chitimacha Tribe of Louisiana  
Chairman  
P.O. Box 661, Charenton, LA,  
70523

Coushatta Tribe of Louisiana  
Chairman  
P.O. Box 818, Elton, LA, 70532

Jena Band of Choctaw Indians  
Chairman  
P.O. Box 14, Jena, LA, 71342

Tunica-Biloxi Indian Tribe  
Chairman P.O. Box 1589,  
Marksville,  
LA, 71351

Mississippi Band of Choctaw  
Indians Chairman  
P.O. Box 6010, Choctaw Branch,  
Choctaw, MS, 39350

Eastern Band of Cherokee  
Indians  
88 Council Loop Road  
Cherokee, NC 28719

Catawba Indian Nation 996  
Avenue of Nations Rock Hill,  
SC 29730